

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA**  
**AFFIDAVIT IN SUPPORT OF AN APPLICATION OF A SEARCH WARRANT**

TO: Chief United States Park Police or any other law enforcement official

(Specific Law Enforcement Officer or Classification of Officer of the Metropolitan Police Department or other Authorized Agency)

Affidavit, herewith attached, having been made before me by Detective Sergeant Robert Steinheimer, Badge #869, United States Park Police, Washington, D.C., that he has probable cause to believe that in the vehicle known as a gray colored, 2016 Chrysler 200, 4 door, with Virginia license plate VKN6572, expiration: 10/17, VIN# 1C3CCCAB4GN132220 located at 3155 V Street, Northeast, Washington, DC,

which is located within the District of Columbia, there is now being concealed certain property, namely an "Event Data Recorder" (EDR) and/or "Airbag Control Module" (ACM), installed by the manufacturer which is essential in providing data to further determine any and all factors that may have contributed to a motor vehicle crash fatality. Analysis of the aforementioned data is needed by the Crash Reconstructionist to determine the underlying cause of the crash.

And as I am satisfied that there is probable cause to believe that the property so described is being concealed on the above designated (person) (premises) (vehicle) (object) and that the foregoing grounds for issuance of the warrant exist.

YOU ARE HEREBY AUTHORIZED within 10 days of the date of issuance of this warrant to search in the daytime at any time of the day or night, the designated vehicle for the property specified, and if the property be found there

YOU ARE COMMANDED TO SEIZE IT, TO WRITE AND SUBSCRIBE in an inventory of the property seized; to leave a copy of this warrant and return, to file a further copy of this warrant and return with the Court on the next Court day after its execution.

Issued this 26 day of June, 2017

[Signature]  
 Judge, Superior Court of the District of Columbia

**RETURN**

I received the above warrant on JUNE 26, 2017 and have executed it as follows:

On JUNE 28, 2017, at 1235 A M., I searched the (person) (premises) (vehicle) (object) described in the warrant and I left a copy of the warrant and return with VEHICLE properly posted.

The following is an inventory of the property taken pursuant to this warrant:

EDR/ACM BLACK BOX: CHRYSLER P/N P68264878 AA  
CHRYSLER S/N TNRMF256500933

REMOVED FROM THE CENTER DASHBOARD OF  
CHRYSLER 200, VIRGINIA LICENSE PLATE VKN6572.

This inventory was made in the presence of: STEINHEIMER, CLARK, WEISBAUM

I swear that this is a true and detailed account of all properly taken by me under this warrant.

[Signature]

Executing Officer

SUBSCRIBED AND SWORN TO BEFORE ME THIS 6<sup>th</sup> DAY OF July 2017

[Signature]

JUDGE, SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

US v. Blakeney discovery p. 730

FILED  
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**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA  
AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A SEARCH WARRANT**

**Gray, 2016 Chrysler 200, 4 door, with Virginia tag VKN6572, expiration:  
10/17, VIN# 1C3CCCAB4GN132220 located at 3155 V Street, Northeast,  
Washington, DC**

1. This affidavit is submitted in support of an application for a search warrant for the entire vehicle and its contents, more particularly described as a gray colored, 2016 Chrysler 200, 4 door, displaying Virginia license plate VKN6572, expiration: 10/17, VIN # 1C3CCCAB4GN132220 which contains manufacturer installed "Event Data Recorder" (EDR) and/or "Airbag Control Module" (ACM). This vehicle was seized on June 5, 2017, pursuant to the investigation of a motor vehicle crash fatality, from the scene in Prince Georges County Maryland. The vehicle remains in the custody of the United States Park Police, inside of a secured facility located at 3155 V Street, Northeast, Washington, DC
2. Your Affiant, Detective Sergeant Robert Steinheimer, Badge #869, has been a duly sworn federal law enforcement officer since July of 1990. Your affiant has been assigned to the United States Park Police, Criminal Investigations Branch, Major Crimes Unit, empowered by law to investigate and make arrests for violations of federal law, as well as violations of District of Columbia, Maryland and Virginia law, since August of 2005. Your affiant's responsibilities include the investigation of all crimes as assigned, to include death investigations, sexual assaults, robberies and assaults occurring within United States Park Police primary jurisdiction. During this time, your affiant has been involved in the investigation of over fifty motor vehicle crash fatalities.
3. The following facts and circumstances set forth in this affidavit are based upon your affiant's personal knowledge, training, observations, experience and investigation, along with the findings of other officers, investigators and detectives involved in this investigation. All observations referenced hereinafter, not made personally by your affiant, were relayed to your affiant by the persons who made such observations, by those who corroborated such information or from reports reviewed by your affiant. This affidavit is intended to merely show that there is sufficient probable cause for the requested search warrant and does not set forth all facts and information known by law enforcement about this matter.

*R. Steinheimer* 869

SUBSCRIBED AND SWORN TO BEFORE ME THIS 26 DAY OF June 2017

*[Signature]*  
JUDGE, SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

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**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA**  
**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A SEARCH WARRANT**

4. On June 5, 2017 at approximately 2236 hours U.S. Park Police Officers were dispatched to the area of Suitland Parkway and Naylor Road, Temple Hills Maryland, for a motor vehicle crash, with injuries. Upon their arrival, Officers observed a grey Chrysler, 200, 4 door, VKN6572 VA on the grass shoulder south of the Suitland Parkway and a blue Nissan, Altima, 4 door, 8BR2108 MD in the right lane of Eastbound Suitland Parkway. Both vehicles were observed to have extensive damage to the front end and passenger side. The operator and sole occupant of the Nissan, 8BR2108 MD, was transported to MedStar Trauma Center, with non-life threatening injuries by P.G. County EMS personnel. The operator of the Chrysler, VKN6572 VA, was transported to P.G. Hospital with non-life threatening injuries. The front seat passenger of the Chrysler, VKN6572 VA, was pronounced dead by P.G. County Fire/EMS personnel and remained on the scene.
5. Preliminary investigation and interviews revealed that the Nissan, 8BR2108 MD, was travelling Eastbound on the Suitland Parkway, just east of the ramp to Branch Avenue, in the left lane. The Chrysler, VKN6572 VA, was travelling Westbound on the Suitland Parkway, west of the ramp from Branch Avenue. The Chrysler crossed over the raised, curb, center median and struck the Nissan head on, causing extensive damage to the front end and passenger side of both vehicles. The collision caused the Nissan to spin 180 degrees and come to rest in the right lane and the Chrysler to leave the roadway, south of the Suitland Parkway and come to rest on the grass shoulder.
6. Both of the aforementioned vehicles, involved in the crash, were documented during the on scene, post-crash, investigation, then impounded as evidence and taken to the secure U.S. Park Police evidence storage facility located at 3155 V Street, Northeast, Washington, DC, where it is currently being stored.

R Heil - 869

SUBSCRIBED AND SWORN TO BEFORE ME THIS 26 DAY OF June <sup>2017</sup>

[Signature]  
 JUDGE, SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

3:30 pm  
 6-26-17  
 O'Connell  
 11:58 AM

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA**  
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7. The grey 2016 Chrysler 200, 4 door, with Virginia tag VKN6572, expiration: 10/17, VIN# 1C3CCCAB4GN132220 was determined to be equipped with an "Event Data Recorder" (EDR) and/or "Airbag Control Module" (ACM), Installed by the manufacturer. The EDR is a combination of an accelerometer and a computer algorithm integrated into the ACM. These components are capable of recording and storing several parameters existing while the vehicle is in motion, at the time of the crash and five seconds prior to the crash. The EDR and ACM are very similar to the "black Box" found on aircraft. Some of the parameters include: the state of the driver's seatbelt switch, any diagnostic codes present at the time of crash, headlight status, engine RPM's, vehicle speed, brake status and throttle position. This information can be obtained by downloading the data into a computer via interface with a CDR retrieval kit and/or other forensic software.
8. Based upon the aforementioned facts and circumstances, your affiant submits that the data on the EDR and/or ACM is essential in providing data to further determine any and all factors that may have contributed to this crash. The data analysis is needed by the crash reconstructionist to determine the underlying cause of the crash. Your affiant respectfully requests that this search warrant be issued for the EDR and/or ACM in the grey 2016 Chrysler 200, 4 door, with Virginia tag VKN6572, expiration: 10/17, VIN# 1C3CCCAB4GN132220, currently located at 3155 V Street, Northeast, Washington, DC.

*R. Stein 869*

SUBSCRIBED AND SWORN TO BEFORE ME THIS 26 DAY OF June <sup>2017</sup>

*[Signature]*  
 JUDGE, SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

10-20-17 3:30 pm